



DRAFT
GOVERNMENT OF PAKISTAN
MINISTRY OF LAW AND JUSTICE

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 Ministry of Law and Justice,
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 Secretariat,
 Islamabad.
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**APPLICATION FOR THE RETURN OF A CHILD UNDER THE HAGUE
 CONVENTION ON THE CIVIL ASPECTS OF INTERNATIONAL CHILD
 ABDUCTION, 1980**

REQUESTING CENTRAL AUTHORITY
 OR APPLICANT:

REQUESTED AUTHORITY:

Concerns the following child
 who will attain the age of 16 on (dd.mm.yyyy).....

NOTE: The following all columns should be filled/completed

I—IDENTITY OF THE CHILD AND ITS PARENTS

E. Office done

Child	First	Middle	Last
A. Name	HAMDAN	ARSHAD KHAN	HAYA KHAN
B. Gender	MALE		FEMALE
C. Date and place of birth (Copy of Birth Certificate is required)	ORLANDO		HOUSTON
D. Habitual residence before removal or retention	ISLAMABAD, PAK		ISLAMABAD, PAK
E. Passport or Identity card no.	US PASSPORT		US PASSPORT
F. Description and photo,	Attached		Attached

2 Parents

2.1 Mother

A. Name	KHUSHBO SEEMAS
B. Date and place of birth	- SWAT, PAK
C. Nationality	PAKISTANI
D. Occupation	HOUSEWIFE - UNEMPLOYED
E. Habitual residence	ISLAMABAD, PAK (prior to abduction)
F. Passport or Identity card no.,	- passport

Law & Justice Division
 Sol-I Section
 Dy.No. 140
 Dated 03/02/2025

DAS-III
 DS-II
 03/2/25

2

2.2 Father:

A. Name MUHAMMAD ARSHAD KHAN
B. Date and place of birth [REDACTED] - SWAT, PAK
C. Nationality PAKISTANI
D. Occupation BUSINESSMAN
E. Habitual residence ISLAMABAD + DOHA - QATAR
F. Passport or Identity card No., [REDACTED] - Passport

2.3 Date and place of marriage JUNE 01 2013 - SWAT, PAK

Copy of Marriage Certificate
is required attached

II—REQUESTING INDIVIDUAL
OR INSTITUTION

- i. Father/Mother MUHAMMAD ARSHAD KHAN
ii. Through Central Authority

3

III—PLACE WHERE THE CHILD IS PRESUMED TO BE

4.1 Information concerning the person alleged to have removed or retained the child

Last known address

FRANKLINVILLE, NEW JERSEY, USA

Passport or Identity card
no., if any

KHUSHBO SEEMRAJ (AB5230442 - Passport)

Description and photo

attached

4.2 Address of the child

HAMDAN SCHOOL - MAIN ROAD ELEMENTARY SCHOOL, Newfield, NJ
HAYA SCHOOL - MARY F JANVIER, FRANKLINVILLE, NJ4.3 Other persons who might be
able to supply additional
information relating to the
whereabouts of the childResiding illegally with
ALI KHAN (215-840-4157)
AYESHA BIBIIV—TIME, PLACE, DATE AND CIRCUMSTANCES OF THE WRONGFUL
REMOVAL OR RETENTION

OCT 25 2024 - PESHAWAR AIRPORT to Miami AIRPORT
 The mother took the children without the
 father's consent while he was abroad working
 in Qatar. The father only discovered their
 departure on December 24, 2024. It is suspected
 that her family forged guardianship documents
 to facilitate their unauthorized travel.

V—FACTUAL OR LEGAL GROUNDS JUSTIFYING THE REQUEST

The children's habitual residence is
 Islamabad, Pakistan. Their removal violates
 the father's parental rights & custody. The
 Hague Convention on Civil aspects of
 International Child Abduction mandates their return.

4

VI—CIVIL PROCEEDINGS IN PROGRESS

Case No.....

Court.....

Present Status of Case.....

.....

.....

VII—CHILD IS TO BE RETURNED TO:

- a. Name Muhammad Arshad Khan
Date and place of birth [REDACTED] Swat, Pak.
Address (m.arshad.k84@gmail.com) House 32, Street #12, G13/3, Islamabad
Telephone number +923339114002/+97466313025
b. Proposed arrangements for return of the child Immediate repatriation with the assistance of US/Pakistani authorities.

VIII—OTHER REMARKS

She stole gold & cash from my home to finance this trip to USA. She is working at Ali Khan's restaurant in violation of US laws while on visit visa. She is attempting to seek Asylum in the US based on false claims.

IX—LIST OF DOCUMENTS ATTACHED*

- 1) Photographs of the abducted children, & mother.
- 2) Birth certificate of children.
- 3) Passport copies of mother & children.
- 4) Mother Identity Card Number.
- 5) Marriage Certificate.
- 6) Proof of habitual residence. (school photos & fees)

I authorise the requested Central Authority and its agents to act on my behalf and to do all things reasonable and necessary in connection with this application.

Date..... 03 - FEB - 2025

Place..... ISLAMABAD

Signature and/or stamp of the requesting Central Authority or applicant

Aslam

* e.g. Certified copy of relevant decision or agreement concerning rights of custody or rights of access; certificate or affidavit as to the applicable law; information relating to the social background of the child; authorization empowering the Central Authority to act on behalf of applicant.

MUHAMMAD ARSHAD KHAN

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